

Description of Action Needed	Proposed Date to Commence	Responsible Person or Entity	Proposed Actual Completion Date
Meeting with each client (or as applicable client representative to obtain consent or refusal of settlement terms)	June 16, 2022	All counsel for Plaintiffs	July 12, 2022
Preparation of Joint Status Report to the Court setting forth the parties' proposed procedure and timeline for presentation of the proposed settlement to the court	June 23, 2022	All counsel	July 25, 2022
Presentation to and engagement of counsel for preparation of trusts for each plaintiff needing such a trust		Plaintiffs' counsel, designated plaintiffs and attorneys of VanWinkle firm	
Provision to trust counsel of background information or responses to questionnaires of all children or incompetent adults		Plaintiffs' counsel	
Provision to trust counsel of background information or responses to questionnaires of all impoverished children or adults		Plaintiffs' counsel	
Further explanation to clients as to disposition of settlement funds belonging to minors to be held as required under law		Plaintiffs' counsel	
Preparation of Motion for Consolidation of Actions for Purposes of Settlement	July 15, 2022	All counsel	
Preparation of Motion for Appointment of Special Master for Purposes of Settlement as	July 15, 2022	All counsel	

Chart | Table of Proposed Timeline for Completion of Settlement and Closure of Cases

Description of Action Needed	Proposed Date to Commence	Responsible Person or Entity	Proposed Actual Completion Date
Provided in Settlement Agreement			
Preparation of Memoranda of Law Supporting Motions	July 17, 2022	All counsel	
Completion of Joint Status Report	July 21, 2022	All counsel	
Filing of Joint Status Report	July 25, 2022	D. Brandon Christian	
Filing of Motions for Consolidation and Appointment of Special Master	July 25, 2022	D. Brandon Christian	
Attend hearing for status conference and motions for consolidation and appointment of special master	To bet set by court	David Wijewickrama	
Prepare notices to each plaintiff for presentation to Special Master	August 15, 2022	Plaintiffs' counsel	
Complete documentation for be presented to Special Master	August 16, 2022	Plaintiffs' counsel	
Arrange for Special Master's informal hearings to be conducted in Clay County Courthouse (commencing September 6, 2022, to be concluded by September 20, 2022)	August 1, 2022	Plaintiffs' counsel	
Set hearing times with Plaintiffs	August 10, 2022	Plaintiffs' counsel	
Meet with Plaintiffs who desire additional meetings prior to informal consultation or informal hearing with Special Master	August 15, 2022	Plaintiffs' counsel	August 25, 2022
Special Master's informal	September 6,		September 20,

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hearings	2022		2022
Completion of Special Master's Findings and Report	September 21, 2022	Judge Cromer (Counsel as needed)	October 1, 2022
Obtain Social Security Trust Waiver	September 22, 2022	VanWinkle firm (Brian Lawler)	
Preparation and filing of Motion for Hearing on approval of Special Master's Report approval of Settlement Distribution for and on behalf of minor plaintiffs	October 1, 2022	Plaintiffs' counsel	October 1, 2022
Conferences with Plaintiffs in preparation for hearing on approval of Special Master's Report approval of Settlement Distribution for and on behalf of minor plaintiffs	October 2, 2022 - October 15, 2022		
Attend hearing on Special Masters' Report and approval of settlements involving or for benefit of minor plaintiffs	To be set by the Court	Plaintiffs' counsel Defense counsel Judge Cromer Van Winkle firm	
Complete documents for payments, funding, distribution	Within 10 days of receipt of Court's orders on Master's Report and settlements for benefit of minors		
Prepare and file dismissals			